TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

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VS.

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GEORGE M. RANALLI, ESO.
    Nevada Bar No. 5748
    VICKI DRISCOLL, ESQ.
 2
    Nevada Bar No. 3939
   RANALLI ZANIEL FOWLER & MORAN, LLC
 3
    2340 W. Horizon Ridge Parkway, #100
    Telephone: (702) 477-7774
    Facsimile: (702) 477-7778
    ranalliservice@ranallilawyers.com
 5
    Attorney for Defendant,
    WALGREEN CO.
 6
 7
                       UNITED STATES DISTRICT COURT
 8
                        FOR THE DISTRICT OF NEVADA
9
    DONNEESHA VENABLE,
10
              Plaintiff,
11
```

LE,) Case No.: 2:22-cv-01147-JAD-DJA tiff,) STIPULATION AND ORDER REGARDING BREACH OF DUTY

ECF No. 15

WALGREEN CO d/b/a WALGREENS)
#13900, a Foreign Corporation;)
DOES I through X; and ROE)
CORPORATIONS I through X,)
inclusive;)

REGARDING BREACH OF DU

AND DISMISSAL WITH
PREJUDICE OF OTHER

BREACH OF DUTY
ALLEGATIONS

Defendants.)

STIPULATION AND ORDER REGARDING BREACH OF DUTY AND DISMISSAL WITH PREJUDICE OF OTHER BREACH OF DUTY ALLEGATIONS

Defendant, WALGREEN, CO., by and through its attorney of record, GEORGE M. RANALLI, ESQ., with the law firm of RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff DONNEESHA VENABLE, by and through her attorneys of record, Boyd B. Moss III, Esq. and John C. Funk, Esq., with the law firm of MOSS BERG INJURY LAWYERS, hereby stipulate and agree as follows:

HENDERSON, NEVADA 89052 TELEBROAM: (2007) 477 7774	1/=///+ I'AA. (/02)+
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1.	On Ju	ıly	20,	2020,	Defend	ant	WALGR	EEN	CO.	bread	ched	a c	duty
	of c	are	owe	d to	Plaint	iff	when	an	emp	Loyee	cam	e i	nto
	conta	act	with	the	protect	ive	polyc	arbo	nate	shie	eld s	seci	ıred
	on th	ne c	check	cout (counter	as h	ne was	s re	achi	ng ar	cound	it	. to
	assis	st P	lain	tiff	causing	it	to ti	p or	er o	onto	Plair	ntif	f ′ s
	head;	:											

- 2. Defendant does not admit to and does contest the elements of causation and damages as to Plaintiff's alleged injuries;
- 3. Plaintiff dismisses with prejudice all other breaches of duty against Defendant WALGREEN CO. alleged in the subject Complaint filed on June 2, 2022, in District Court, Clark County, Nevada, Case No. A-22-853474-C.

DATED June 9, 2023

MOSS BERG INJURY LAWYERS

/s/ Boyd B. Moss III

BOYD B. MOSS III, ESQ.

Nevada Bar No. 8856 **JOHN C. FUNK, ESQ.**

Nevada Bar No. 9255

20 | Nevada Bar No. 9255 4101 Meadows Lane, Ste. 110 21 | Las Vegas, Nevada 89107

21 | Las Vegas, Nevada 8910 | Attorneys for Plaintiff

DATED: June 9, 2023

RANALLI ZANIEL FOWLER & MORAN, LLC

/s/ George M. Ranalli

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

VICKI DRISCOLL, ESQ.

Nevada Bar No. 3939 2340 W. Horizon Ridge

Parkway, #100

Attorney for Defendant,

WALGREEN CO.

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Based on the parties' stipulation [ECF No. 15] and good cause appearing therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that on July 20, 2020, Defendant WALGREEN CO. breached a duty of care owed to Plaintiff when an employee came into contact with the protective polycarbonate shield secured on the checkout counter as he was reaching around it to assist Plaintiff causing it to tip over onto Plaintiff's head;

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendant does not admit to and does contest the elements of causation and damages as to Plaintiff's alleged injuries;

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that

all other breach-of-duty theories against Defendant WALGREEN CO. alleged in the complaint in this action are DISMISSED with prejudice.

7	U.S Date	District Judge Jennifer A. Dorsey ed: June 14, 2023
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